

UNITED STATES DISTRICT COURT OF THE
SOUTHERN DISTRICT OF NEW YORK

LEAH MCSWEENEY,

Case No.: 1:24-cv-01503-LJL

Plaintiff,

v.

ANDY COHEN, LISA SHANNON, JOHN
PAPARAZZO, DARREN WARD, WARNER BROS.
DISCOVERY, INC., SHED MEDIA US INC.,
NBCUNIVERSAL MEDIA, LLC and BRAVO MEDIA
LLC,

Defendants.

**DECLARATION OF CHRISTINE LEPERA IN SUPPORT DEFENDANTS’
MOTION TO DISMISS PLAINTIFF’S FIRST AMENDED COMPLAINT**

CHRISTINE LEPERA declares under penalty of perjury as follows:

1. I am a partner, through my professional corporation, with the law firm Mitchell Silberberg & Knupp LLP, attorneys of record Defendants Andy Cohen, Lisa Shannon, John Paparazzo, Darren Ward, Warner Bros. Discovery, Inc., Shed Media US Inc., NBCUniversal Medica, LLC, and Bravo Media LLC (“Defendants”) in the above-captioned action.

2. I respectfully submit this declaration in support of Defendants’ Motion to Dismiss Plaintiff’s First Amended Complaint.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the fully-executed version of a document entitled “The Real Housewives of New York City / Leah McSweeney / Talent Agreement,” entered into on October 4, 2019, which concerns Plaintiff Leah McSweeney’s (“Plaintiff”) participation in Season 12 of *Real Housewives of New York* (“*RHONY*”).

4. Attached hereto as **Exhibit 2** is a true and correct copy of the fully-executed version of an agreement entitled “The Real Housewives of New York City / Leah McSweeney /

13th Cycle,” entered into on September 17, 2020, which concerns Plaintiff’s participation in Season 13 of *RHONY*.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the fully-executed version of an agreement entitled “The Real Housewives Limited Series / Leah McSweeney / Talent Agreement,” entered into on May 19, 2022, which concerns Plaintiff’s participation in Season 3 of *Real Housewives Ultimate Girls Trip*.

6. Attached hereto as **Exhibit 4** is a true and correct copy of an article published on the *People* magazine website titled “The ‘Real Housewives of New York City’ Season 14’s All-New Cast Announced: Meet the Ladies,” dated October 16, 2022 and found online at <https://people.com/tv/bravocon-2022-real-housewives-of-new-york-city-season-14-cast-announced/>. This article was accessed and captured by my firm on May 20, 2024.

7. Attached hereto as **Exhibit 5** is a true and correct copy of Plaintiff’s original New York State Department of Human Rights charges, which were filed as three separate Complaints. The substance of the three Complaints within this exhibit are identical.

8. Attached hereto as **Exhibit 6** is a true and correct copy of Plaintiff’s Amended New York State Department of Human Rights charges, which were filed as three separate Amended Complaints. The substance of the three Amended Complaints within this exhibit are identical.

9. Attached hereto as **Exhibit 7** is a true and correct copy of an article published on the website *Hypebae* titled “Manic McSweeney: My Love Affair With My Bipolar II Disorder,” dated August 9, 2016, and found online at <https://web.archive.org/web/20160813040704/https://hypebae.com/2016/8/leah-mcsweeney-bipolar-mental-health>. This article was accessed and captured by my firm on May 3, 2024.

10. Attached hereto as **Exhibit 8** is a true and correct copy of a webpage hosting the RHONY Season 12 Reunion: Part 1, located at <https://www.bravotv.com/the-real-housewives-of-new-york-city/season-12/episode-22/reunion-part-1>. This article was accessed and captured by my firm on May 20, 2024.

11. Attached hereto as **Exhibit 9** is a true and correct copy of a webpage hosting the RHONY Season 12 Reunion: Part 2, located at <https://www.bravotv.com/the-real-housewives-of-new-york-city/season-12/episode-23/reunion-part-2>. This article was accessed and captured by my firm on May 20, 2024.

12. Attached hereto as **Exhibit 10** is a true and correct copy of a webpage hosting the RHONY Season 12 Reunion: Part 3, located at <https://www.bravotv.com/the-real-housewives-of-new-york-city/season-12/episode-24/reunion-part-3>. This article was accessed and captured by my firm on May 20, 2024.

13. Attached hereto as **Exhibit 11** is a true and correct copy of an article published on the *People* magazine website titled “RHONY’s Leah McSweeney Reveals She Had a Christmas ‘Boob Lift’ Over the Holidays,” dated December 28, 2020 and found online at <https://people.com/style/rhony-leah-mcsweeney-reveals-she-got-a-breast-implants/>. This article was accessed and captured by my firm on May 22, 2024.

14. Attached hereto as **Exhibit 12** is a true and correct copy of a letter from Orin Snyder to Plaintiff’s counsel, dated March 6, 2024.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: New York, New York
July 17, 2024

By: /s/ Christine Lepera
Christine Lepera